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Attorneys for plaintiff
Greenwich Capital Financial Products, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GREENWICH CAPITAL FINANCIAL PRODUCTS,
INC.,

Case No.: 07-CV-6523 (PKC)

Plaintiff,
-against-

Electronically Filed

KAY-CO INVESTMENTS, INC. (D/B/A PRO30
FUNDING),

Defendant.

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**NOTICE OF PLAINTIFF GREENWICH CAPITAL
FINANCIAL PRODUCTS, INC.'S APPLICATION FOR JUDGMENT BY DEFAULT
AGAINST DEFENDANT KAY-CO INVESTMENTS, INC. (D/B/A PRO30 FUNDING)**

PLEASE TAKE NOTICE that pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure; and upon the accompanying Affidavit of Scott E. Eckas, sworn to on September 18, 2007, and attached exhibits; the accompanying Affidavit of Anthony Constantine, sworn to on September 21, 2007, and attached exhibits; and all other pleadings and proceedings herein, plaintiff Greenwich Capital Financial Products, Inc. respectfully requests that this Court, before the Honorable P. Kevin Castel, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, Courtroom 12C, New York, New York 10007,

enter a judgment by default against defendant Kay-Co Investments, Inc. in the amount of \$1,767,004.12, which amount consists of \$1,719,793.09 in damages and \$47,211.03 in reasonable costs, attorney's fees and expenses incurred in connection with this action. Attached hereto as Exhibit 1 is the proposed form of default judgment.

Dated: New York, New York
September 24, 2007

MCKEE NELSON LLP

By: /s/ Kevin J. Biron
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